

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE	:	CHAPTER 13
VERA D. MCFARLAND	:	CASE NO: 14-12014JKF
Debtor	:	
	:	
	:	
	:	

DEBTOR'S RESPONSE TO TRUSTEE'S MOTION TO DISMISS

The Debtor, through counsel, responds to the motion of William C. Miller, Esquire, Chapter 13 Standing Trustee (the “Trustee”), to dismiss (the “Motion”) as follows:

1. The Motion asserts that Debtor is not making payments.
2. The Motion should be denied for the reasons stated on the record on December 15, 2016, on the Trustee's prior dismissal motion.
3. To refresh the Court's memory, prior arrears from early 2015 are being paid back slowly through an increased wage garnishment order entered in September 2015.
4. Upon information and belief, the instant motion was computer-generated by the Trustee's office without attorney review based upon those 2015 arrears.
5. The Trustee has not complied with the Court's instruction regarding the procedure for future motions to dismiss for alleged failure to make plan payments, namely to contact Debtor's counsel directly.

WHEREFORE, Debtor prays that this Court enter an Order DENYING the Motion.

/s/ Alfonso G. Madrid
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